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July 7, 2021

VIA ECF

Honorable Edward S. Kiel, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King, Jr. Federal Building and Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: GEA Mechanical Equipment US, Inc. v. Federal Insurance Company et al.
Case No.: 2:20-cv-9741 (BRM) (ESK)

Dear Judge Kiel:

This firm represents defendants Hartford Accident and Indemnity Company, Hartford Fire Insurance Company and First State Insurance Company (collectively, "Hartford") in the above-referenced matter. On behalf of Hartford, defendants The Continental Insurance Company ("Continental") and Wellfleet New York Insurance Company as successor to Atlanta International Insurance Company ("AIIC" and, together with Hartford and Continental, the "Defendants"), and plaintiff GEA Mechanical Equipment US, Inc. ("Plaintiff"), we submit this joint letter in advance of the telephonic status conference in this matter scheduled for Tuesday, July 13, 2021.

This is an asbestos insurance coverage action. Plaintiff's complaint seeks a declaration regarding the parties' rights and duties with respect to a single underlying asbestos claim and future underlying asbestos claims under insurance policies issued by Defendants.

On October 8, 2020, Your Honor denied the Defendants' motion to compel Plaintiff to produce certain information and documents protected by the attorney-client privilege. [ECF 17]. The Defendants subsequently filed a timely appeal of that decision, which was recently affirmed by Judge Martinotti. [ECF 32 and 33]. Following that affirmance, the parties have been working together to schedule fact depositions, which they had refrained from doing while the appeal was pending. The depositions of all party 30(b)(6) witnesses as well as one third party 30(b)(6) witness are scheduled to occur over the next several weeks. The parties thus believe that they are on track to complete fact discovery by the current deadline of August 31, subject to the testimony elicited at the depositions. As to expert discovery and summary judgment motion practice, the parties have met and conferred and propose the following schedule:

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October 15, 2021	Parties to serve expert reports regarding issues on which that party has the burden of proof
November 30, 2021	Parties to serve opposition expert reports
January 14, 2022	Parties to serve rebuttal expert reports
February 25, 2022	Completion of all expert discovery
April 11, 2022	Parties to serve and file summary judgment motions
May 26, 2022	Parties to serve and file oppositions to summary judgment motions
June 24, 2022	Parties to serve and file summary judgment reply papers

If Your Honor is amenable to this proposed schedule, the parties will submit a scheduling order on consent for entry by the Court.

We thank Your Honor for the time and courtesies extended in this matter. We look forward to speaking with Your Honor on Tuesday.

Respectfully,

/s/ John Maloney

JOHN MALONEY

cc: All counsel of record (via ECF)